

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

VICTOR MEJIA RIOS, individually; W.D.M.R., individually and by and through his Parent, VICTOR MEJIA RIOS; JORGE LUIS MARTINEZ MARTINEZ, individually; J.L.M.F., individually and by and through his Parent, JORGE LUIS MARTINEZ MARTINEZ; TOMAS ANTONIO OLIVEROS, individually; A.R.O., individually and by and through his Parent, TOMAS ANTONIO OLIVEROS; WILDER XITUMAL GARCIA, individually; A.M.X.C., individually and by and through his Parent, WILDER XITUMAL GARCIA; PEDRO CARRILLO JIMENEZ, individually; M.C.J., individually and by and through his Parent, PEDRO CARRILLO JIMENEZ; NELSON CAZALEGNO PAZ, individually; O.J.C.S., individually and by and through his Parent, NELSON CAZALEGNO PAZ; JOSE PINEDA RIVERA, individually; J.M.P.A., individually and by and through his Parent, JOSE PINEDA RIVERA; WILSON PINEDA GONZALES, individually; W.E.P.S., individually and by and through his Parent, WILSON PINEDA GONZALES; NOE WALTER PEREZ GONSALEZ, individually; G.L.P.G., individually and by and through his Parent, NOE WALTER PEREZ GONSALEZ; MARVIN REYES PORTILLO, individually; M.R.R.R., individually and by and through his Parent, MARVIN REYES PORTILLO; RUBIER NATO DE OLIVEIRA, individually; G.H.D.O., individually and by and through his Parent, RUBIER NATO DE OLIVEIRA; OBDULIO VASQUEZ PUAC, individually; T.P.C., individually and by and through his Parent, OBDULIO VASQUEZ PUAC; ELMER VELIZ RIVERA, individually; E.Y.V.B., individually and by and through his Parent, ELMER VELIZ RIVERA;

Plaintiffs,

v.

THE GEO GROUP, INC.,

Defendant.

CIVIL ACTION NO. 19-552

Case No. 5:19-CV-00552

PLAINTIFFS' MOTION FOR AN EXTENSION OF TIME FOR PLAINTIFFS TO FILE A CLAIMS CHART

Plaintiffs Victor Mejia Rios, *et al.* ("Plaintiffs") file this Motion requesting that the Court extend the current deadline for Plaintiffs to file the Court's ordered Claims Chart [Dkt. 68]. Pursuant to this Court's January 5, 2022 Order, Plaintiffs' Claims Chart is due to be filed on or before February 22, 2022. Plaintiffs' counsel are interviewing each of the Plaintiff Fathers and Sons in order to prepare the Claims Chart, and to date have completed interviews with eleven of the Plaintiff Fathers and two of the Plaintiff Sons, with the remaining interviews to be completed within the next ten days. In light of these interviews and the information exchanged by the Parties to date, Plaintiffs' counsel anticipate filing a Motion for Leave to File a Second Amended Complaint with the Claims Chart, in order to narrow and focus the claims, align the pleadings with the facts, streamline discovery, and clarify the issues for resolution in this case.

Further, during the extension, the Parties will be able to work together on an agreement for a detailed discovery-control plan that is as cost-effective and efficient as possible.

Plaintiffs have conferred with Defendant The GEO Group, Inc., who oppose this Motion but do not intend to file an opposition brief.

Plaintiffs therefore respectfully request that the Court extend Plaintiffs' deadline to file the Court's requested Claims Chart to March 22, 2022.

Dated: February 18, 2022

Respectfully submitted,

/s/ Jacob M. Gilbert

Jule Rousseau, Esq. (admitted *pro hac vice*)

Jacob M. Gilbert, Esq. (admitted *pro hac vice*)

ARENT FOX LLP

1301 Avenue of the Americas, Floor 42

New York, NY 10019

(P) 212-484-3900

(F) 212-484-3990

jule.rousseau@arentfox.com

jake.gilbert@arentfox.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on the date specified below, a true copy of this document was electronically filed with the Clerk of the Court using CM/ECF, and that CM/ECF will send a notice of electronic filing to all registered CM/ECF users and that there are no known non-registered CM/ECF users in this case.

Executed on the 18th day of February, 2022.

/s/ Jacob M. Gilbert

Jacob M. Gilbert